

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: December 2, 2016

CAO File No. 0220-05294-0000
Council File No. 14-0366-S4
Council District: All

To: Planning and Land Use Management Committee

From: Miguel A. Santana, City Administrative Officer

Sharon M. Tso, Chief Legislative Analyst

Subject: **MARIJUANA REPORT BACK – ANALYSIS OF LAND USE COMPATIBILITY AND PERMITTING PROCESSES FOR MARIJUANA-RELATED BUSINESSES (C.F. 14-0366-S4)**

SUMMARY

During its consideration of a motion (C.F. 14-0366-S4) on October 25, 2016, your Committee requested a joint report from the Offices of the City Administrative Officer (CAO) and the Chief Legislative Analyst (CLA) to provide examples of permitting processes for sensitive activities, as well as, additional tools the City could utilize to protect communities from the proliferation and over-concentration of marijuana-related businesses (MRBs).

The adoption of the City's Proposition (Prop) D in 2013, Ordinance No. 182580, limited the number of medical marijuana businesses (MMBs) to 135, and the Ordinance qualified for a Categorical Exemption (CE) under the California Environmental Quality Act, meaning that an Environmental Impact Report (EIR) was not required because the MMBs were not expected to have a significant effect on the environment.

If the City adopts new ordinances in response to the Medical Cannabis Regulation and Safety Act (MCRSA), and/or adoption of the Adult Use of Marijuana Act (AUMA), an environmental analysis that may include up to an EIR could be required for cultivation, production, distribution and processing of marijuana plants and related products, and other specific land use considerations.

STATE LICENSING AND ENFORCEMENT

Medical Cannabis Regulation and Safety Act

MCRSA divides state licensing and enforcement responsibilities among three agencies:

- The Department of Food and Agriculture will issue medical marijuana cultivation licenses.
- The Department of Consumer Affairs will issue licenses for medical marijuana dispensaries, distributors, and transporters.

- The Department of Public Health will issue licenses for medical marijuana manufacturers and testing laboratories.

State licenses will be valid for one year and a separate state license is required for each commercial marijuana business location. Each of the state licensing authorities is responsible for creating regulations governing their respective areas of responsibility. Once MCRSA's regulatory framework is in operation, which the State anticipates will be in January 2018, the medical marijuana industry will operate as follows:

- Medical marijuana cultivators and manufacturers produce medical marijuana products in accordance with state and local regulations.
- Medical marijuana cultivators and manufacturers deliver their products to a medical marijuana distributor.
- The distributor confirms the identity and quality of the products and sends them to a medical marijuana testing laboratory.
- The testing laboratory performs batch testing on a random sampling of the product. If the product meets the safety standards established by the state, the testing laboratory issues a certificate of analysis and returns the product to the distributor.
- The distributor performs a final quality assurance review and then transports the product to a medical marijuana dispensary.
- The dispensary distributes the medical marijuana to qualified patients and primary caregivers.

REGULATORY OPTIONS AVAILABLE TO THE CITY

The following regulatory options can be applied to the MRBs the City may wish to authorize. Options include:

- Express bans – MCRSA recognizes a range of new medical marijuana businesses, including cultivators, manufacturers, distributors, transporters, and testing laboratories. The City may opt to ban all or specific activities under MCRSA.
- Regulatory framework – Since MCRSA establishes a state framework for regulating all aspects of the medical marijuana industry, the City could explore the option of allowing some or all such businesses through some form of a local regulatory permit/license system.

For example, a regulatory permit system could:

- A) Require an annual renewal;
- B) Impose safety-related operating requirements;

- C) Impose operating requirements which may include:
- a. the use of licensed security guards;
 - b. designated hours of operation;
 - c. prohibition against sales of alcohol and/or tobacco;
 - d. prohibition against on-site alcohol and/or tobacco consumption;
 - e. installation of adequate odor control devices and ventilation systems;
 - f. limitations on access to minors; and,
 - g. mandatory inspections by the Police Department (LAPD), Department of Building and Safety (DBS), and Office of Finance (Finance).
- D) Impose locational restrictions, including zoning designation and separation requirements to avoid clustering of MRBs;
- E) Specify certain zoning designations to encourage clustering (e.g. within an industrial zone); and,
- F) Limit the number and type of MRB permits that are issued.

If the City establishes a regulatory framework for MRBs under MCRSA, the City should expect to be inundated with permit inquiries and/or applications. Additionally, unsuccessful applicants will likely look for potential ways to attack the City's selection and evaluation process. Therefore, the City should give careful consideration to how applications will be processed for MRBs. The enabling ordinances should provide clear guidelines as to what information is required in the application, what grounds constitute a basis for denial of a permit, the type of permit or license to be issued Conditional Use Permit (CUP) or other regulatory permit), and the responsible party for making the decision on issuing the permit.

The City could utilize a number of approaches to processing applications and issuing permits, such as:

- A) Scoring System – The City could implement a subjective evaluation process to review MRB applicants. Applicants would receive a score based on a review of their applications. Those applicants who receive the highest scores would then be recommended for approval to the decision making authority. If this selection method is used, it may be preferable to use a neutral outside consultant to review the applications and make recommendations.
- B) First Come, First Serve – The City could accept and review applications in the order they are received, subject to applicable zoning requirements and separation restrictions. The reviewer will ensure that the applicant meets the applicable standards for a MRB and on that basis either grant or deny the permit.
- C) Lottery – The City should expect to receive a large number of applications and may want to consider a lottery system for issuing permits. The advantage of the lottery system is that it provides a degree of neutrality in the selection process.

The disadvantage is that a lottery can deprive the City of control over who gets a permit.

- Permissive zoning – The Zoning Code is drafted in a permissive fashion such that any use not enumerated therein is presumptively prohibited. Under permissive zoning principles, the omission of any particular land use from local zoning regulations is the equivalent of an expressed ban unless the City finds that the proposed use is substantially the same in character and intensity as those land uses listed in the code. If the City can make this finding, such a use is subject to the permit process and zoning requirements which govern the land use category in which it falls. The City can rely on permissive zoning to prohibit marijuana uses if it so chooses. However, MRBs may argue that they fall within various land use categories and descriptions, such as pharmacies, retail sales, nurseries, and agriculture. The City should be cautious in relying on permissive zoning to prohibit medical marijuana land use. These case-by-case requests could result in time-consuming administrative hearings and costly and uncertain litigation. If the City wishes to ban all or some medical marijuana activities, the City should consider adopting expressed prohibitions or create new zones for MRBs.

ZONING AND LAND USE REQUIREMENTS

The following considerations are relevant to future discussions of land use regulations and/or policies related to the conduct of marijuana businesses within the City.

Los Angeles Municipal Code

The Los Angeles Municipal Code (LAMC) is drafted in a permissive fashion such that any use not enumerated therein is prohibited. Therefore, a use that is not an enumerated use under the LAMC is expressly prohibited under the City's permissive zoning framework.

The use of any building, structure, location, premises or land for any type of marijuana business is not currently enumerated in the LAMC as a permitted use in any zone, nor is the use set forth on the Official Use List of the City as determined and maintained by the Zoning Administrator.

The LAMC Section 45.19.6.5 prohibits the Zoning Administrator from adding medical marijuana business as an authorized enumerated use or otherwise authorizing the use by variance. Current provisions of the LAMC Sec. 45.19.6 prohibit medical marijuana businesses, but grant a limited immunity from the enforcement of its prohibition to those medical marijuana businesses that do not violate the restrictions set forth in Proposition (Prop) D.

The LAMC Section 45.19.6.5 states that the Zoning Administrator shall not have the authority to determine that the use of any building, structure, location, premises or land as a medical marijuana business (MRB) may be permitted in any zone; to add MRBs or other marijuana businesses to the Official Use List of the City; or to grant any variance authorizing any medical marijuana business. Those procedures that might otherwise be available for allowing those land uses that are not listed in the zoning code, i.e., via Sec. 12.21-A or Sec. 12.27, are expressly prohibited for MRBs or other marijuana business uses under the current Code limitations.

The relevance of these Code provisions to recreational marijuana businesses would need to be assessed to determine if amendment of the Code would be necessary to accommodate such businesses. If Code amendments were necessary to enact enabling ordinances, they would need to be reviewed via the required legislative process, including public hearings and consideration by the Planning Commission and City Council.

Specific zone limitations were not prescribed under Prop D, though the result of imposing the ordinance limitations was that MRBs appear to generally be located within the following seven zones: C2, C4, C5, CM, M1, M2, and M3. The existing ordinance was based on limiting medical marijuana businesses within proximity to defined sensitive uses and residential-zoned property (see below). Findings supporting the adoption of the ordinance included balancing uncontrolled proliferation of medical marijuana businesses, segregating incompatible uses, preventing new development from interfering with existing residents or businesses, and preserving the character of local communities. Adoption of the ordinance was also found to be in conformity with public necessity, convenience, general welfare and good zoning practice.

Every MRB is prohibited within a 1,000-foot radius of a school or within a 600-foot radius of a public park, public library, religious institution, child care facility, youth center, alcoholism, drug abuse recovery or treatment facility, or other MRB. Additionally, every MRB is prohibited that provides ingress or egress to its premises on any side of the location that (i) abuts, (ii) is across a street, alley or walk from, as measured at 90 degrees from the lot lines of the location, or (iii) has a common corner with any land zoned residential, except that an exit door required by this Code may be maintained for emergency egress only and must be locked from the exterior at all times. The above notwithstanding, this subsection shall not prohibit a medical marijuana business from locating across a street from, or having a common corner with, any land zoned residential if the medical marijuana business is separated from that residential zone by a public thoroughfare with a minimum roadway width of 80 feet.

The attached maps illustrate the existing zoning for each Council District. The buffer requirements relative to distance may limit or preclude the establishment of a marijuana business within a particular community or neighborhood because: 1) some communities have a greater percentage of land designated and zoned for industrial or commercial use, while others may be predominantly zoned for residential use and 2) a particular community or neighborhood may have a high concentration of churches, hospitals, parks, schools, or other defined sensitive use.

Issues of geographic equitability and potential overconcentration of marijuana businesses within a particular community or neighborhood should be considered when establishing limitations regarding proximity to sensitive uses and residential-zoned properties.

The Prop D ordinance is based on limiting MRBs within proximity to defined sensitive uses and residential-zoned property with the express intent to balance uncontrolled proliferation of medical marijuana businesses, segregate incompatible uses, prevent operations from interfering with existing residents or businesses, and to preserve the character of local communities. Specific zone limitations were not prescribed under Prop D, though the result of imposing the ordinance limitations was that medical marijuana businesses appear to generally be located within the following seven zones: C2, C4, C5, CM, M1, M2, and M3.

The City could adopt ordinances to enact a comprehensive regulatory framework which could cover the entire supply chain for medical and recreational marijuana businesses - from the cultivation, production, and processing of marijuana plants/products to point-of-sale distribution and marketing. An updated GIS/land use analysis would need to be conducted in order to amend Chapter 1 of the Code to include provisions specific to marijuana-related uses and any associated zoning regulations, including identifying marijuana businesses as an enumerated use under the Code.

ADMINISTRATION

Staffing and Administration

The regulation of marijuana-related businesses in the City may require new staff to oversee licensing and regulation. Business owners seeking a permit to operate in the City may have to receive sign-offs from various Departments (Department of City Planning (DCP), DBS, Finance, LAPD, etc.) to ensure they are in compliance with the City's regulations. First, the City should identify which businesses, if any, will be allowed to apply and what requirements it will impose on business owners prior to issuing a permit to operate. These should include distance requirements, safety and security requirements, among others. If the Council decides to establish a regulatory framework, then the Council should consider existing City permitting processes and whether or not an existing process could be replicated or expanded to regulate marijuana-related businesses. The City could require a new Certificates of Occupancy (DBS), as well as, a Conditional Use Permit (CUP) for all marijuana-related businesses. The City currently issues permits for establishments that sell alcohol (CUB) and establishments that provide adult entertainment (CUX). If the City creates a process that clearly identifies which businesses are authorized to do business in the City, then Finance could establish a process to reject businesses that apply for a Business Tax Registration Certificate (BTRC) to conduct marijuana-related business without the appropriate authorization. Alternatively, the City could consider creating a new unit within an existing department or adopt an ordinance to create a new panel, board, or department to oversee and regulate marijuana-related businesses. The costs associated with marijuana regulation should also be calculated, in order to determine the appropriate fee for full cost-recovery. Further, licenses to operate a marijuana-related business should be annual, with renewals required to ensure that businesses are continuing to meet the City's requirements.

Conditional Use Permit

The City may choose to regulate marijuana sales through the Conditional Use Permit (CUP) process, overseen by DCP, much like the sale of alcohol for on- or off-site consumption. This process ensures community input is received and enables the City to effectively regulate certain types of land uses which may need special conditions to ensure that the use is compatible with the surrounding area. The CUP process is well-established, has worked well for other sensitive uses, and could likely be expanded to include the regulation of MRBs. The CUP process would also enable the DBS and LAPD to more effectively enforce laws related to marijuana, as the right to inspection by LAPD and other requirements can be included in the CUP. If the City decides to not use the CUP process to regulate marijuana related businesses in the City, a new process should be created.

An inspection program for MRBs would require adequate staff resources, inasmuch as existing DCP resources would be inadequate to address demand likely generated Citywide. A designated special unit within the DCP would be needed to process entitlement requests, conduct discretionary review, and issue determinations. Special unit staffing would rely on the full range of Planning Department staff as well as Area Planning Commissions, City Attorney, and Council support.

The challenges associated with the CUP process include a lengthy review process, including potential for a high percentage of appeals due to controversy, as well as, the potential for costly and uncertain litigation. Therefore, DCP staff provided a rough cost estimate indicating that approximately \$900,000 would be needed in funding for additional staff resources to conduct work assessing whether applicants can seek zoning variances or other land use discretionary relief from Code provisions which Proposition D currently prohibits. This is a preliminary calculation inasmuch as further analysis is needed to quantify the total costs to set up a special unit within the DCP, in addition to any additional resources that may be needed if staff from other departments are required to fully staff the requested unit.

The Adult Use of Marijuana Act (AUMA) contains a provision preserving local control and states that nothing in AUMA shall limit or supersede the authority of local jurisdictions "to completely prohibit the establishment or operation of one or more types of businesses licensed under" the AUMA.

The City could rely on permissive zoning to prohibit medical marijuana uses if it so chooses. However, marijuana establishments may argue that they fall within various land use categories and descriptions, such as pharmacies, retail sales, nurseries, and agriculture.

The City may consider adopting expressed prohibitions or creating new zones allowing for marijuana-related uses that:

1. Impose locational restrictions, including zoning designation and separation requirements to avoid clustering of medical marijuana businesses.
2. Limit or prohibit cultivation within certain zones, locations of the City.
3. Allow for deliveries to encourage opportunities for socioeconomic and geographic equity.

Other policy options to consider if the CUP process is not acceptable include: 1) establishing a City Board/Commission to oversee the regulation of marijuana-related businesses; or, 2) creating a new Panel under the authority of an existing Board/Commission to manage the City's oversight of marijuana-related businesses.

Board/Commission

Policy makers could create a new, independent Board of Commissioners to oversee all marijuana-related issues in the City. This Board could be modeled after others in the City, with five members appointed by the Mayor for staggered five-year terms and confirmed by the

Council. With the exception of the Board of Public Works, all other City Boards are part-time, with Commissioners paid an attendance fee. A Board can be established by ordinance or by Charter amendment.

Panel

Instead of creating a new Board, the City could create a new Panel under the oversight of an existing Board of Commissioners, modeled after the Police Permit Review Panel (PPRP), which is responsible for issuing and overseeing permits for Café Entertainment and Shows, Motion Picture Shows, and Picture Arcades. The PPRP is composed of seven members, at least two of which have expertise that is relevant to the regulation of charitable organizations and the various activities in which they engage. Subsidiary Panels enable the Board they serve under to focus on major policy issues instead of permit issuance and oversight.

Insofar as all commercial marijuana activity is still illegal under federal law, a Police Department-affiliated body may not be the appropriate body to authorize such conduct. Ultimately, the decision to use an existing process, create a new process, or create a new entity to oversee marijuana business licenses in the City is a policy decision.

LOCAL LICENSING AND PERMITTING PROCESSES

The licensing and permitting processes will inform the permit types, operating conditions, and agencies that will be involved in the approval process. The City may choose to require a CUP (issued by DCP) and a certificate of occupancy (issued by DBS) in addition to the business tax registration certificate (BTRC) which is issued for tax purposes.

The CUPs are required for certain land uses which may need special conditions to ensure compatibility with surrounding land uses. Major issues involved with the evaluation of CUP requests include consistency with the General Plan; compatibility with surrounding land uses; conditions to ensure compatibility; land suitability and physical constraints; project design; availability of adequate access, public services, and facilities to serve the development; and potential environmental impacts and mitigation measures. The City requires these for establishments that sell alcohol (CUB) and adult entertainment (CUX). The City could adopt a similar process for marijuana businesses or create an entirely new process.

Certificates of occupancy are only issued for a new building and/or a new use or a change of use. The City could require a marijuana business to acquire a building permit which would only be approved if plans showing compliance with the terms of the LAMC for the new use are reviewed and approved by DBS. The site would also be inspected by DBS pursuant to the terms of the permit and the approved plans. A Certificate of Occupancy would only be issued to a marijuana business when the establishment complies with the plans and the terms of the permit and the DBS inspector approves. Currently, a marijuana dispensary is simply a retail establishment. Therefore, a dispensary going into an already approved retail store would need no approvals or inspections from DBS.

At least three City agencies have a vested interest in conducting inspections: 1) LAPD should be allowed to do inspections of marijuana businesses in a manner similar to bars and liquor stores with a license from the California Department of Alcohol Beverage Control (ABC);

2) DBS should be allowed to verify that operating conditions are maintained after permit issuance; and, 3) Finance should be allowed to audit each marijuana business. All inspections and related permit fees charged to marijuana businesses should be set at full cost recovery.

Other Considerations

The Mayor and Council may wish to consider the following additional issues:

- Create criminal and administrative penalties, and give the regulatory authority the ability to suspend and/or revoke a business license or any other permit/authorization
- Include enforcement in the Administrative Citation Enforcement (ACE) program;
- Require annual renewals of licenses/permits, and possibly require all employees to have a permit to work in a marijuana business, similar to the City's regulation for employees involved in ammunition sales;
- Ensure that all fees include the cost allocation plan (CAP) rates for other City department employees involved in marijuana regulation;
- Set clear requirements for LiveScan results that would disqualify an individual from working/owning a marijuana business;
- High taxes and different tax frameworks for recreational marijuana and medical marijuana could encourage individuals to continue to buy marijuana on the black market;
- Registration and permitting process that clearly states which businesses are authorized and which ones are not. LAPD, DBS, DCP, and the Office of Finance currently have no way of knowing which MRBs are legal without significant research; and,
- Licenses should be tied to physical locations and not to individuals.

The Mayor and Council should also consider options for each unique MRB segment for the following issues:

- What is the license/application process?
- How long will licenses/permits be valid for?
- How often should licenses/permits be renewed?
- If a license/permit is revoked, what process, if any, should the City use to backfill the license/permit within City's framework?
- Should marijuana businesses be authorized to sell either medical marijuana, recreational marijuana, or both?

- How often should marijuana businesses be inspected?

BEST PRACTICES

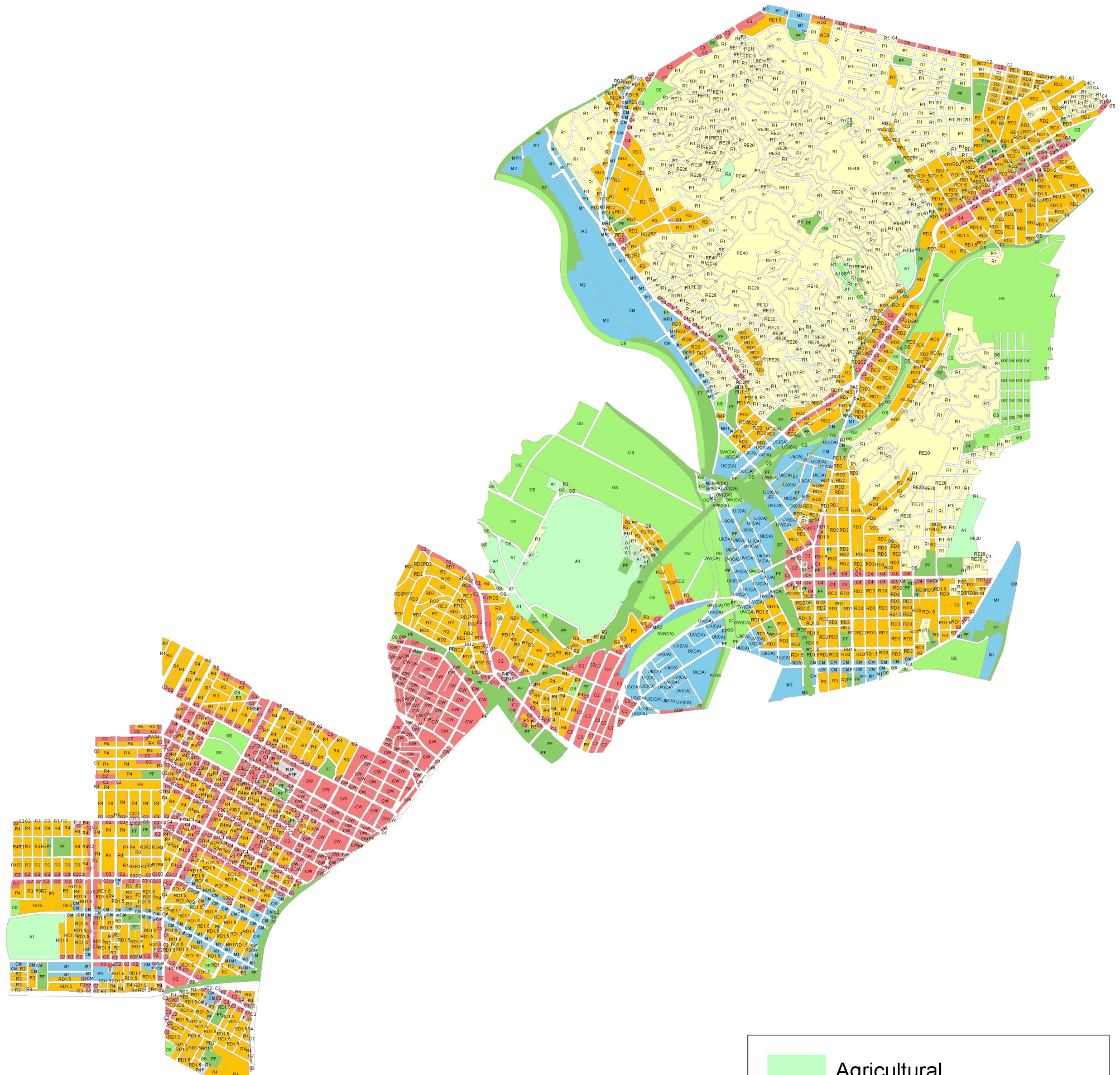
- **Electronic Tracking Systems:** Colorado requires every plant in every cultivation facility to have a barcode-tagging system that is computerized and accessible to regulators. Barcodes can remain separate or be batched, so that marijuana products can be tracked from seed to sale. These systems are used to track and monitor supply and prevent diversion.
- **Temporary Barriers to New Entry:** Colorado reduced the complexity of their market by constructing initial barriers to entry for new MRBs. For a period of time, all MRBs must have come from or been part of an existing medical marijuana dispensary (MMD). This ensured that as implementation began state regulators would only deal with enterprises and owners with whom they were familiar.
- **Video Surveillance Requirements:** Colorado regulators required that cultivation, processing and retail facilities be extensively monitored with video surveillance. Video surveillance prevents diversion and helps police investigate theft. Additionally, MRBs tend to be cash-only businesses and surveillance may reduce the incentives for illegal activity by increasing the odds of detection.
- **Revenue and Funding Distribution:** Taxes should be consistent across all MRBs which allows for more regulatory stability. Taxes and fees should establish a self-funded system which supports all administrative agencies.
- **First Responders:** Local governments should expand training and information about marijuana use and marijuana-related businesses.

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Attachments: Land Use by Category and Council Districts Zoning Maps

<i>Category</i>	<i>Agricultural</i>	<i>Commercial</i>	<i>Manufacturing</i>	<i>Multiple Family Residential</i>	<i>Open Space</i>	<i>Parking</i>	<i>Public Facilities</i>	<i>Single Family Residential</i>	<i>Suburban</i>	<i>Other</i>	<i>Total</i>
CITY	7.0%	5.0%	11.8%	13.2%	15.8%	0.5%	6.6%	35.0%	4.9%	0.2%	100.0%
CD-1	5.0%	11.6%	9.2%	25.7%	13.8%	0.3%	7.5%	26.2%	0.1%	0.7%	100.0%
CD-2	2.1%	5.7%	9.0%	16.9%	5.9%	0.9%	7.8%	51.2%	0.4%	0.0%	100.0%
CD-3	6.6%	3.5%	6.8%	6.9%	6.1%	1.3%	5.3%	42.2%	21.3%	0.1%	100.0%
CD-4	4.8%	4.2%	0.9%	10.9%	23.3%	0.4%	4.3%	51.0%	0.2%	0.0%	100.0%
CD-5	6.1%	4.4%	0.8%	10.7%	11.3%	0.3%	5.5%	55.1%	5.5%	0.3%	100.0%
CD-6	3.6%	4.5%	20.3%	9.8%	16.4%	1.5%	9.2%	31.5%	3.2%	0.0%	100.0%
CD-7	19.4%	1.8%	3.6%	5.4%	25.9%	0.4%	7.8%	27.1%	8.5%	0.0%	100.0%
CD-8	0.0%	11.6%	3.2%	36.5%	1.7%	0.2%	3.2%	41.9%	0.0%	1.6%	100.0%
CD-9	0.0%	15.8%	19.9%	51.0%	3.3%	0.1%	4.5%	4.0%	0.0%	1.4%	100.0%
CD-10	0.0%	13.8%	3.5%	46.2%	3.0%	0.7%	6.5%	25.9%	0.0%	0.4%	100.0%
CD-11	10.1%	2.4%	11.6%	7.4%	31.2%	0.1%	3.3%	33.5%	0.3%	0.1%	100.0%
CD-12	9.2%	3.2%	5.7%	4.0%	16.7%	0.9%	8.0%	39.3%	13.0%	0.0%	100.0%
CD-13	4.2%	13.8%	9.0%	44.5%	5.9%	0.4%	9.4%	12.9%	0.0%	0.0%	100.0%
CD-14	2.2%	9.9%	20.3%	18.9%	5.4%	0.0%	15.8%	27.2%	0.0%	0.2%	100.0%
CD-15	0.7%	4.0%	41.8%	15.5%	7.5%	0.1%	7.5%	22.2%	0.0%	0.5%	100.0%

Council District 1 Zoning



Legend:

- Agricultural
- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential
- Suburban

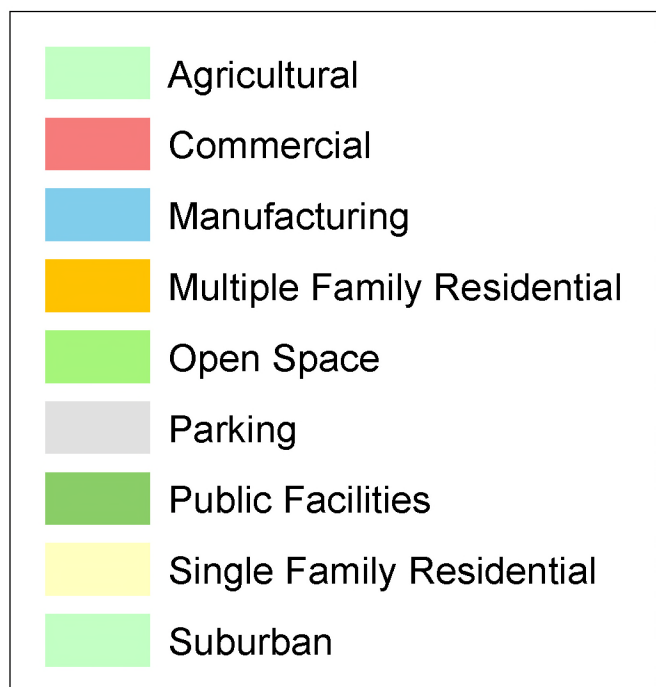
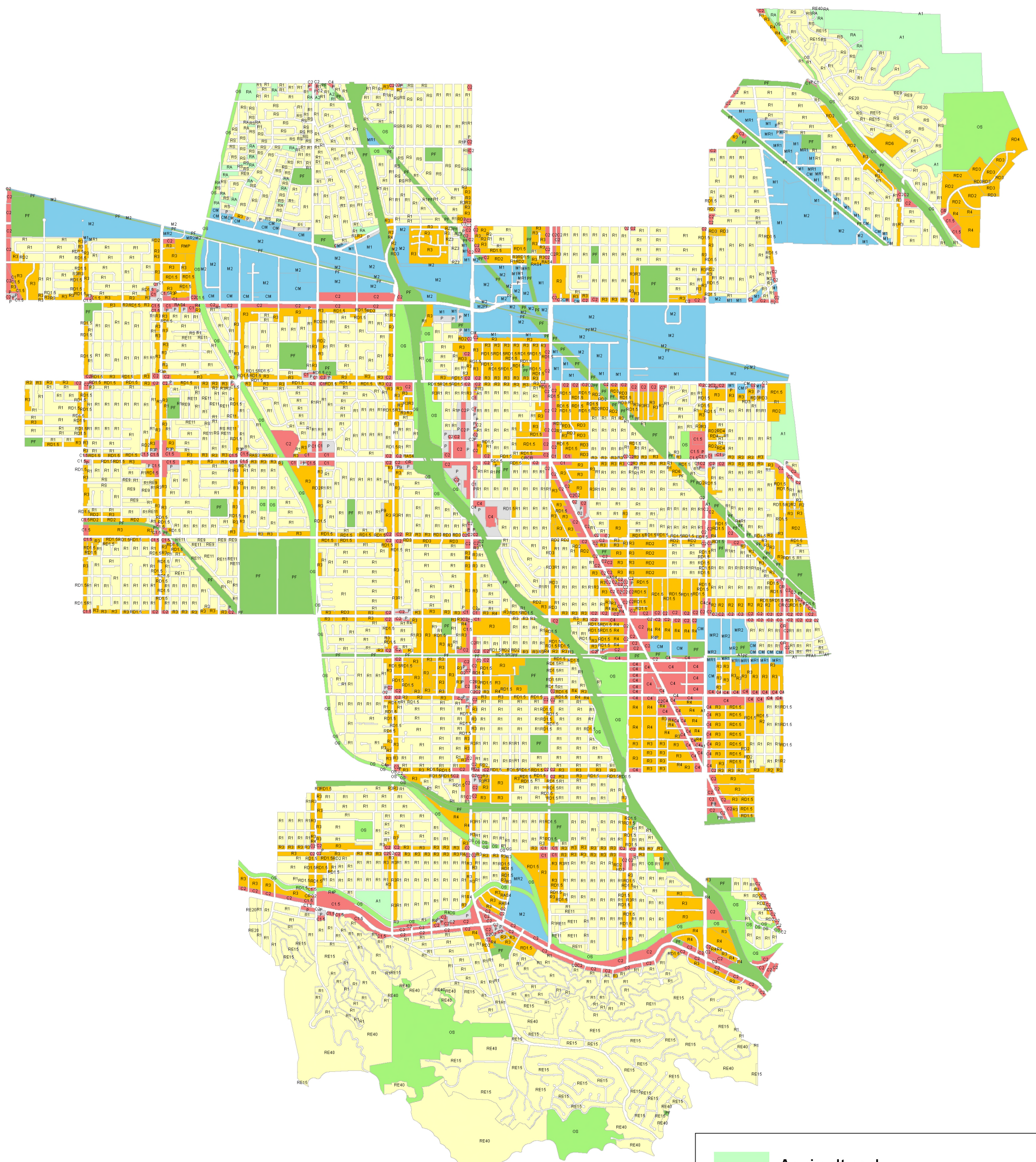
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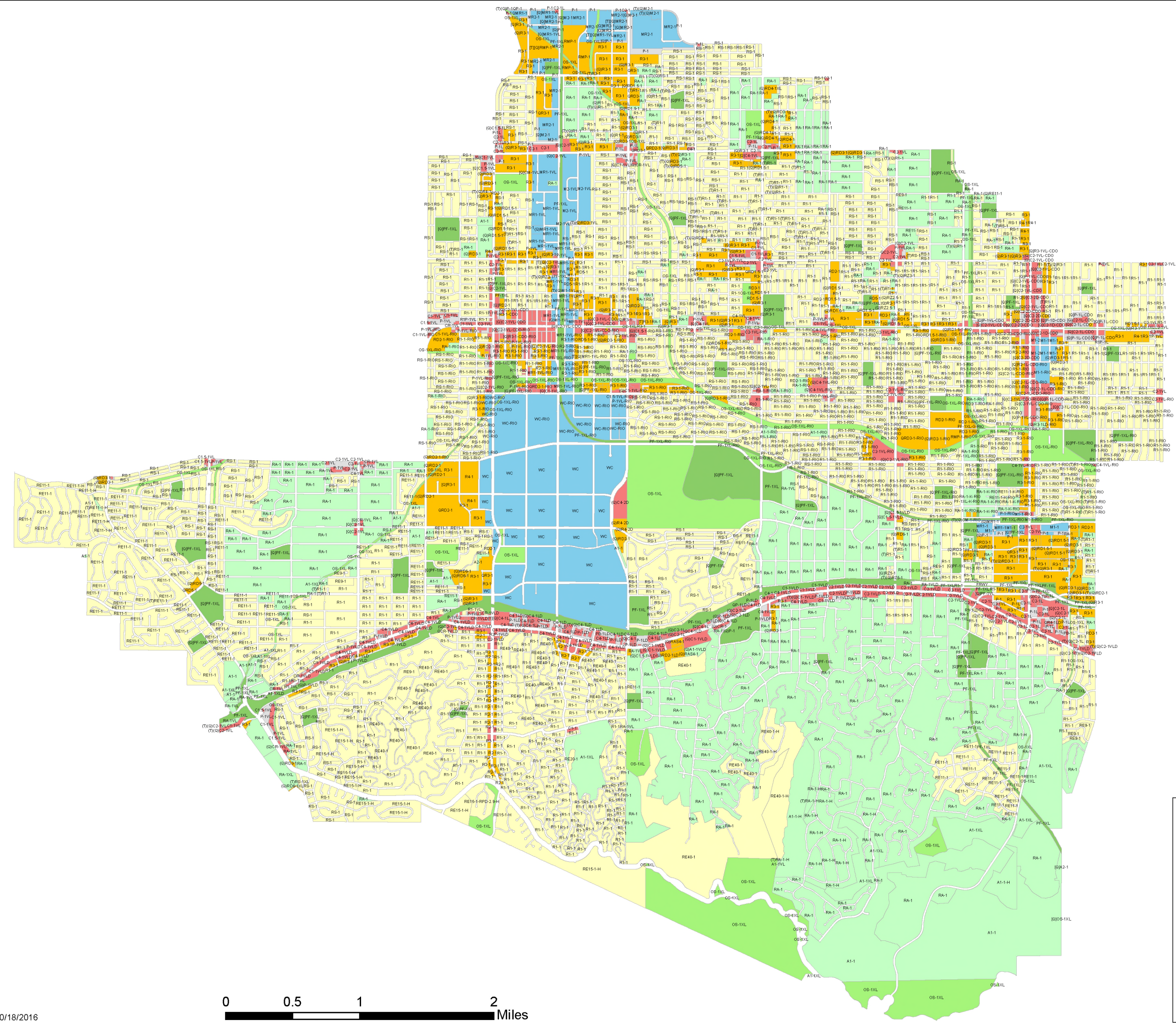
Council District 2 Zoning



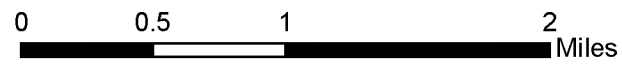
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Council District 3 Zoning

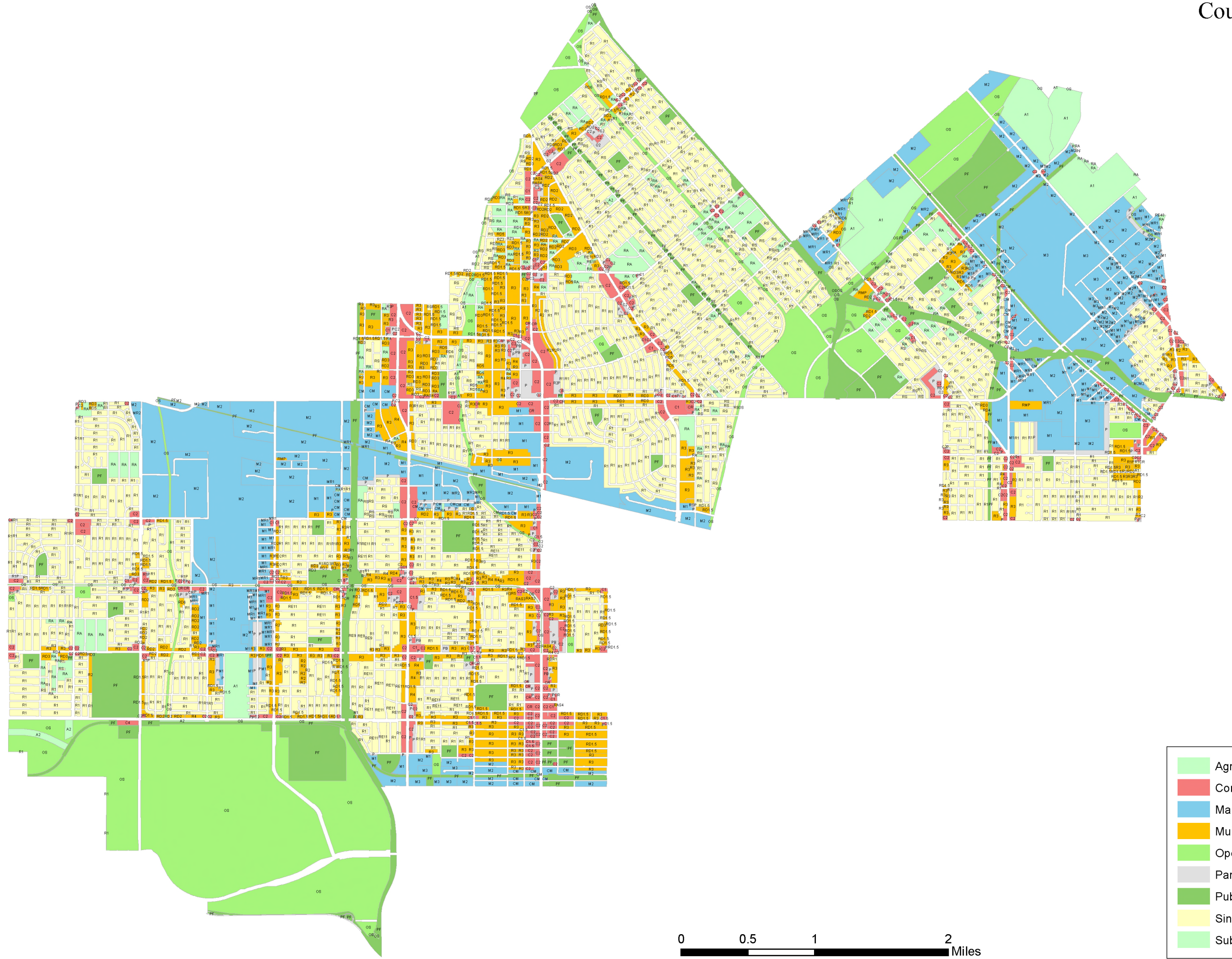


- Agricultural
- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential
- Suburban

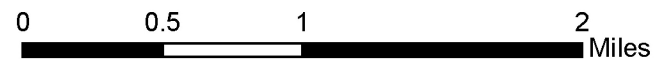


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Council District 6 Zoning



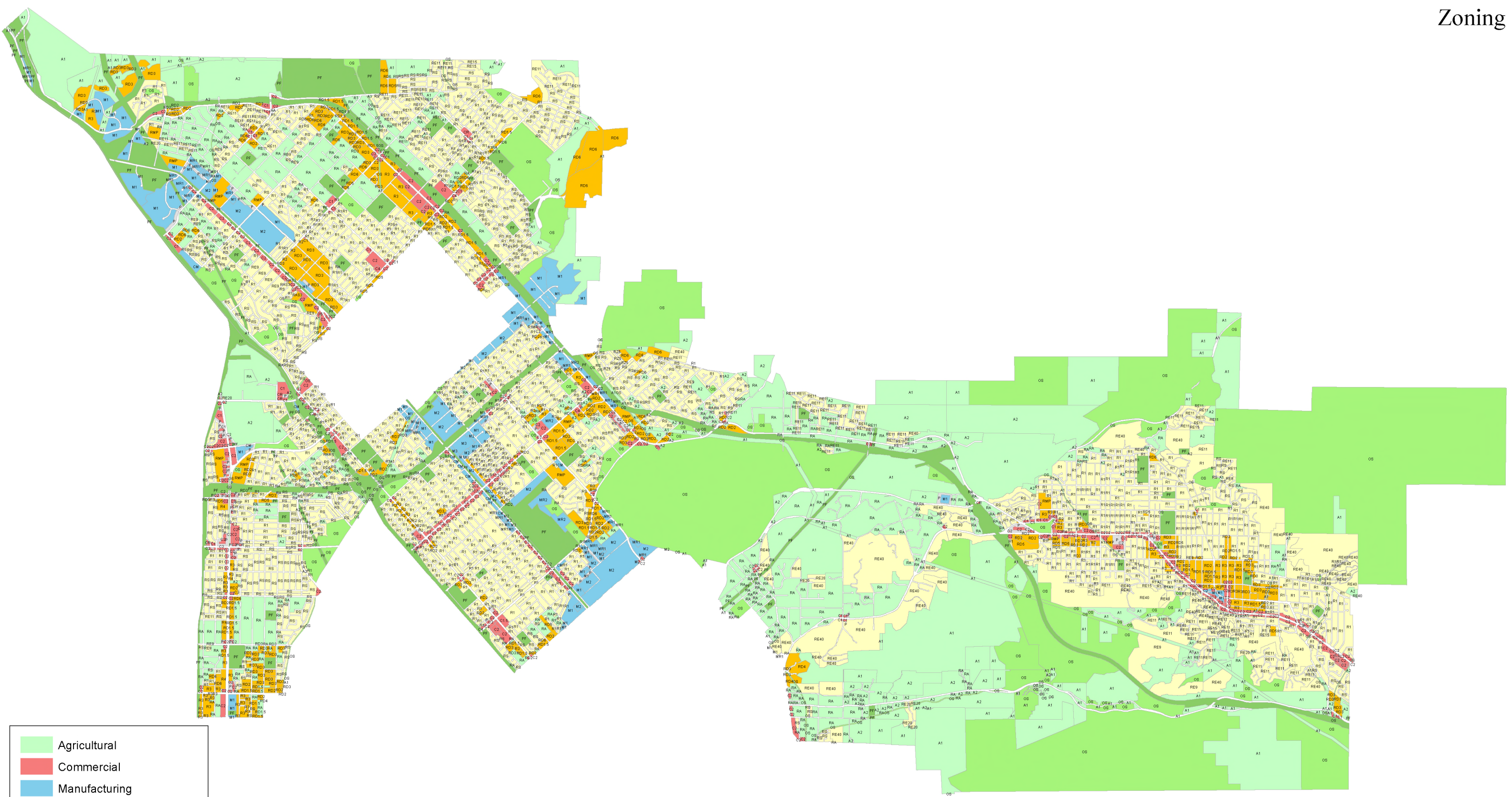
- Agricultural
- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential
- Suburban



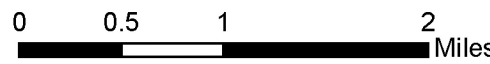
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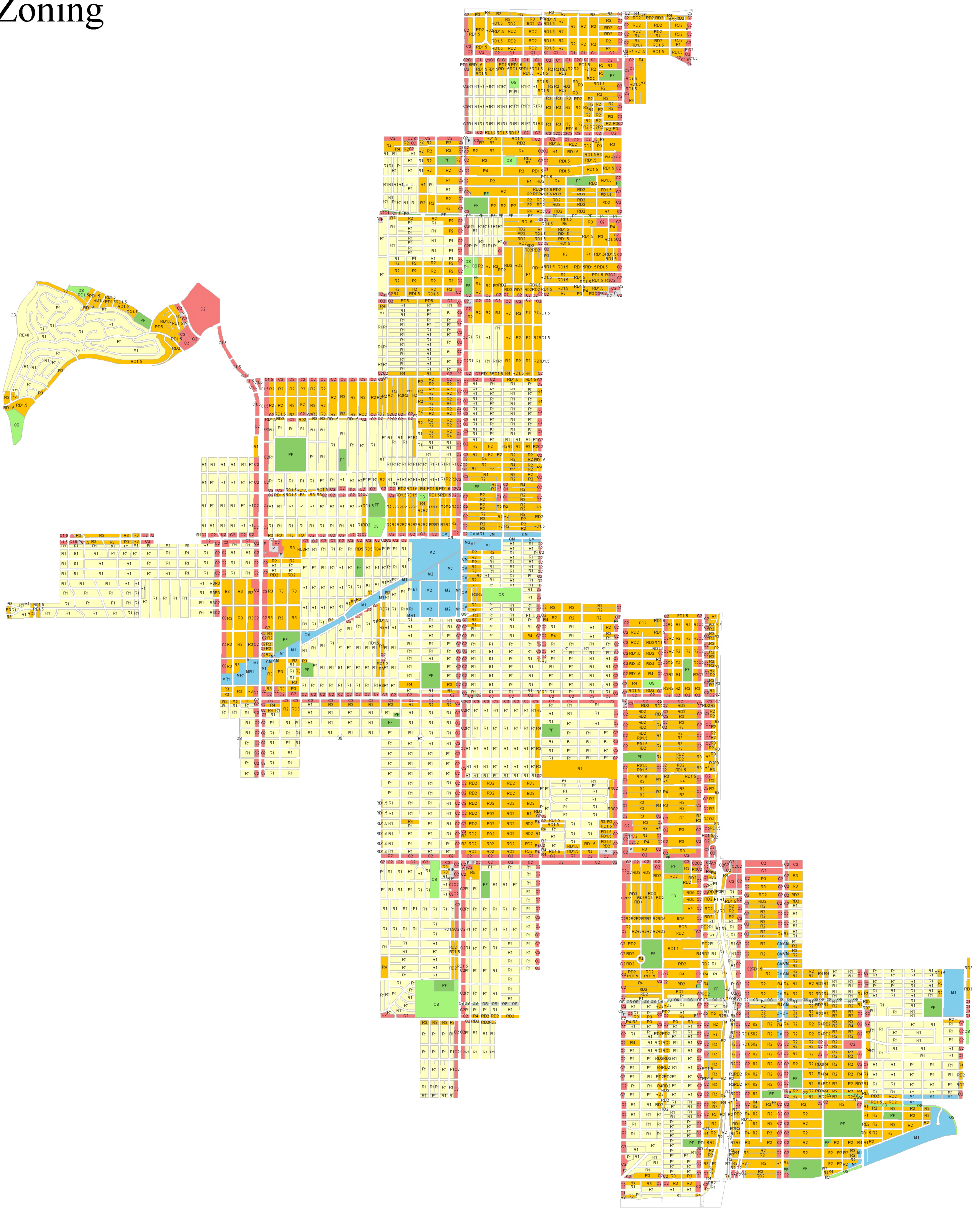
Council District 7 Zoning



- Agricultural
- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential
- Suburban



Council District 8 Zoning

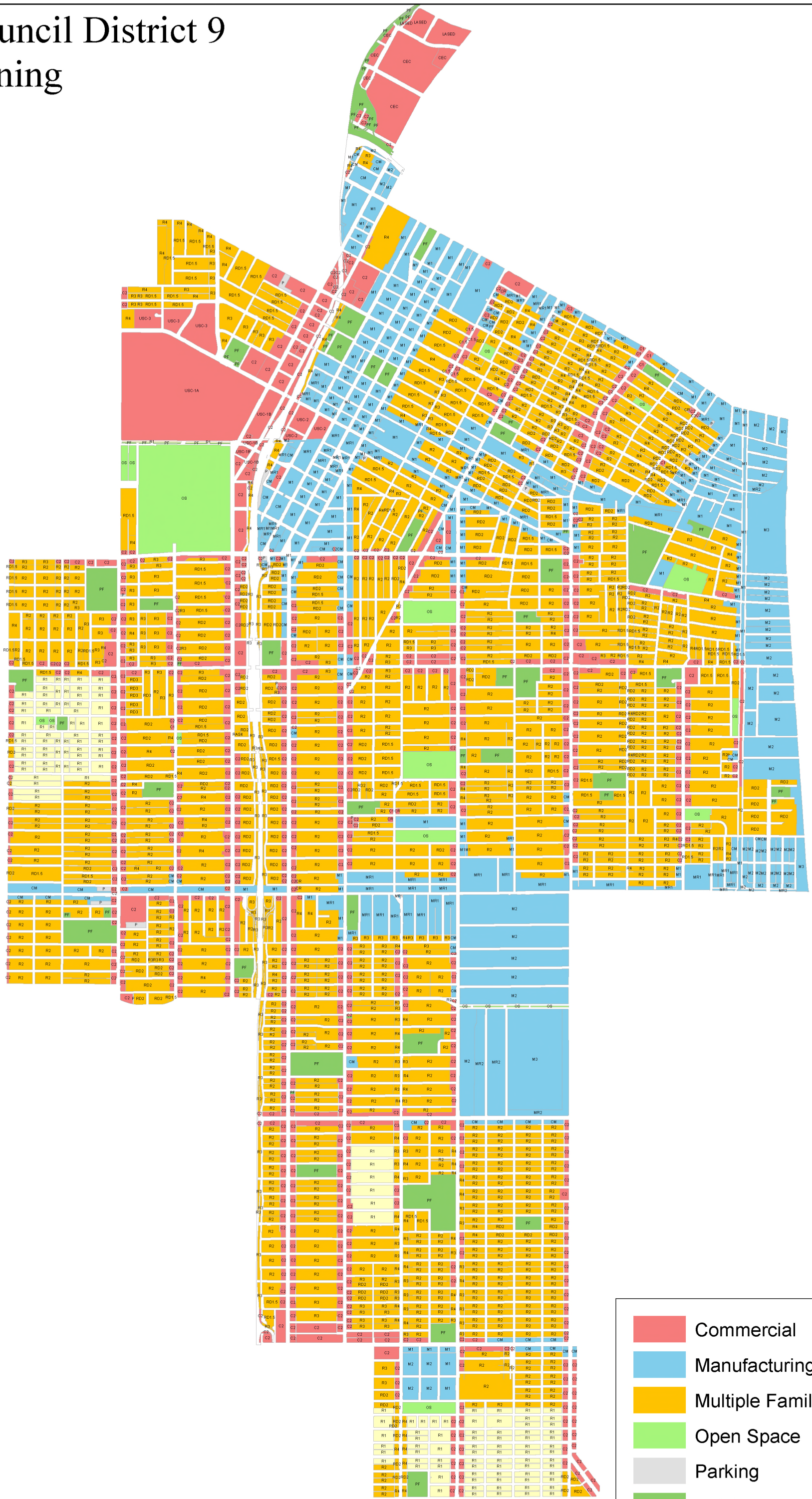


- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential

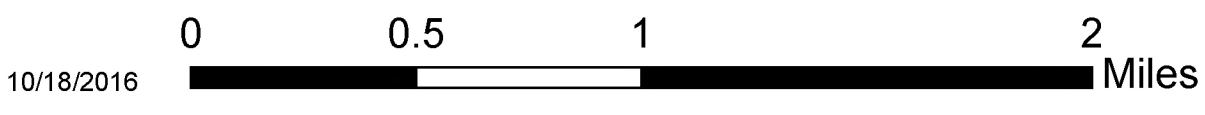


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Council District 9 Zoning

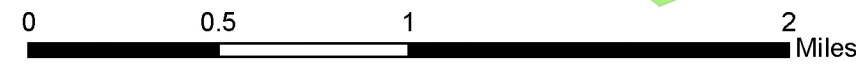
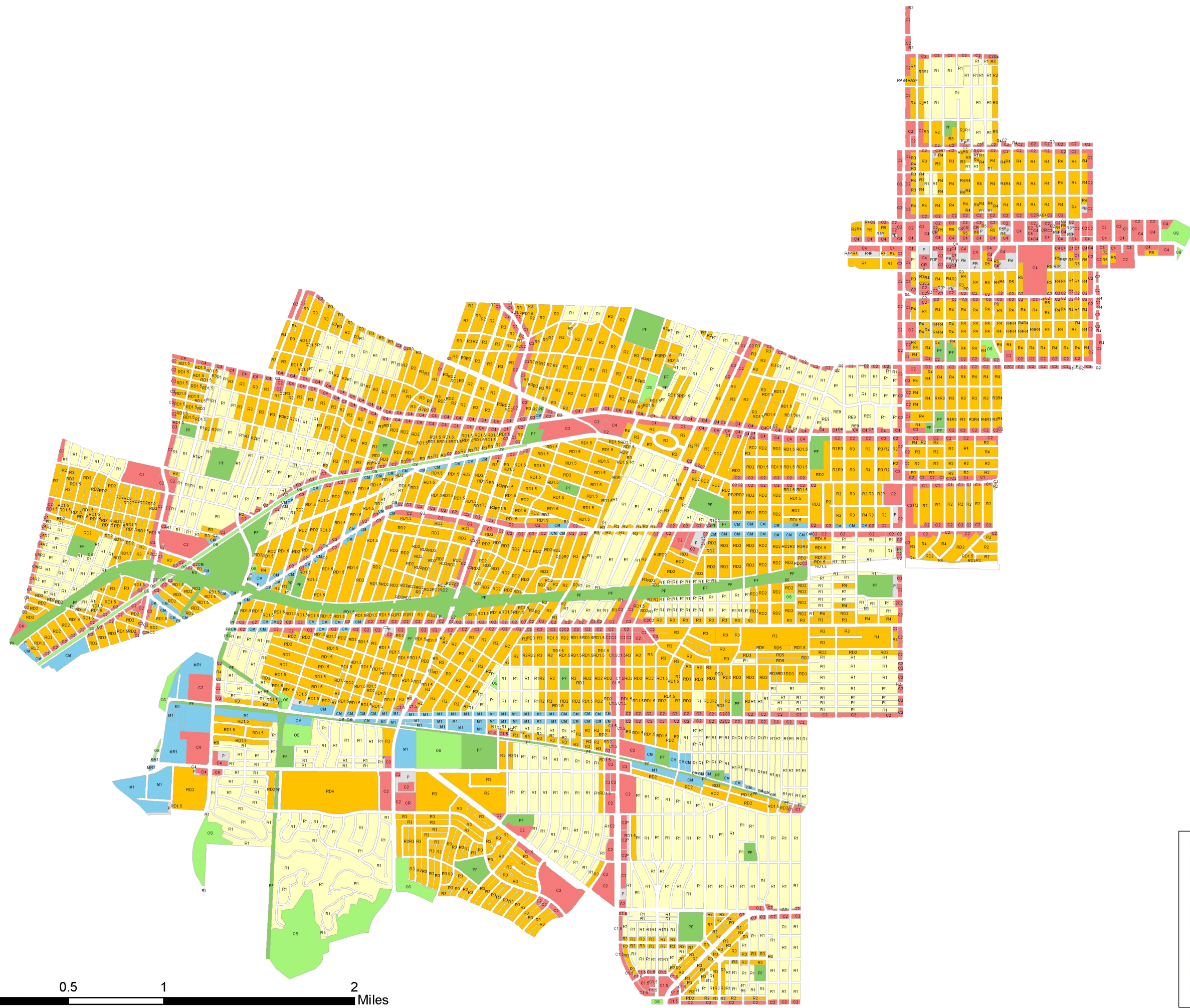


- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential



10/18/2016

Council District 10 Zoning

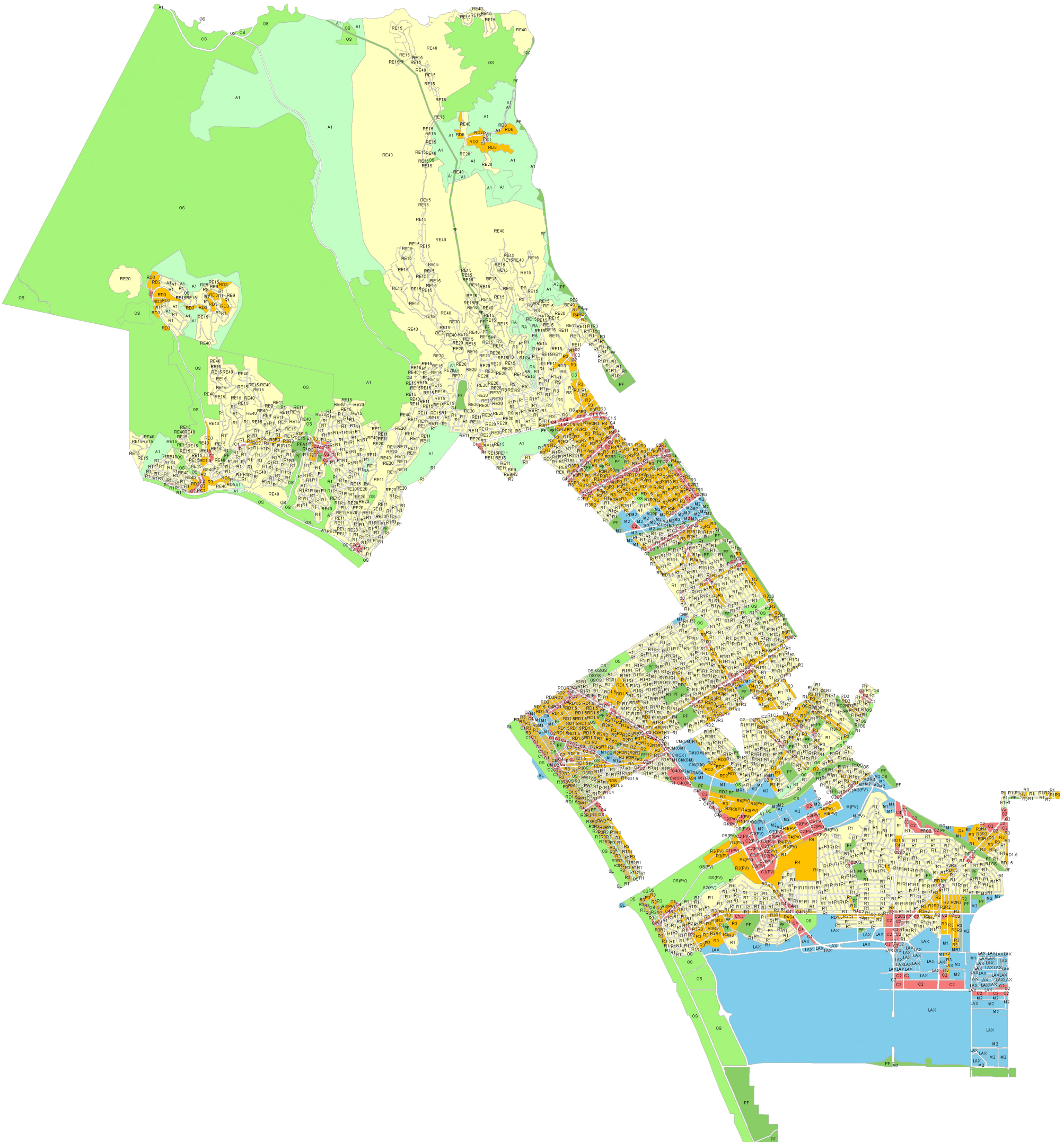


10/18/2016

- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential

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Council District 11 Zoning



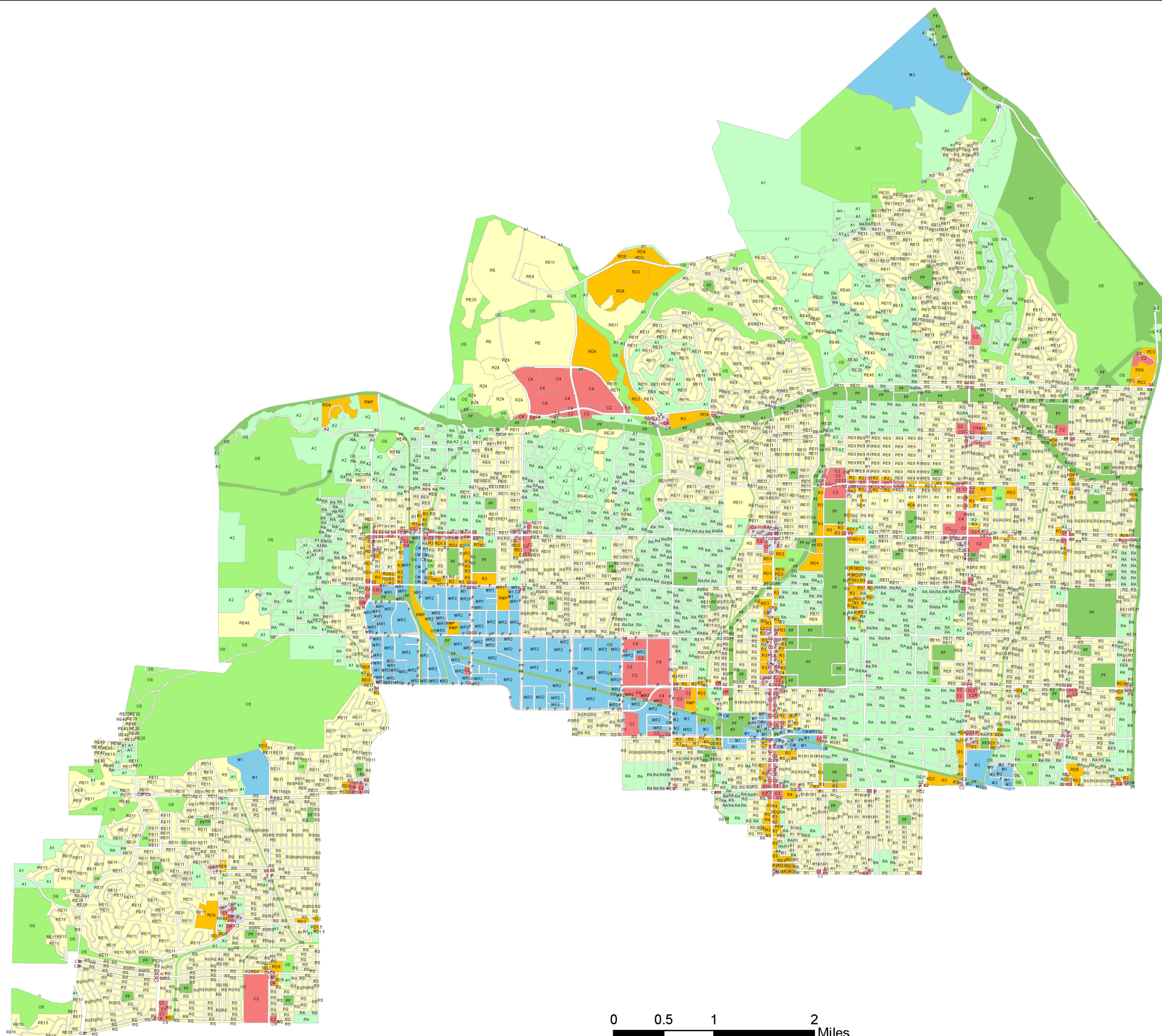
- Agricultural
- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential
- Suburban



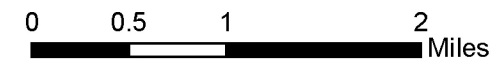
10/18/2016



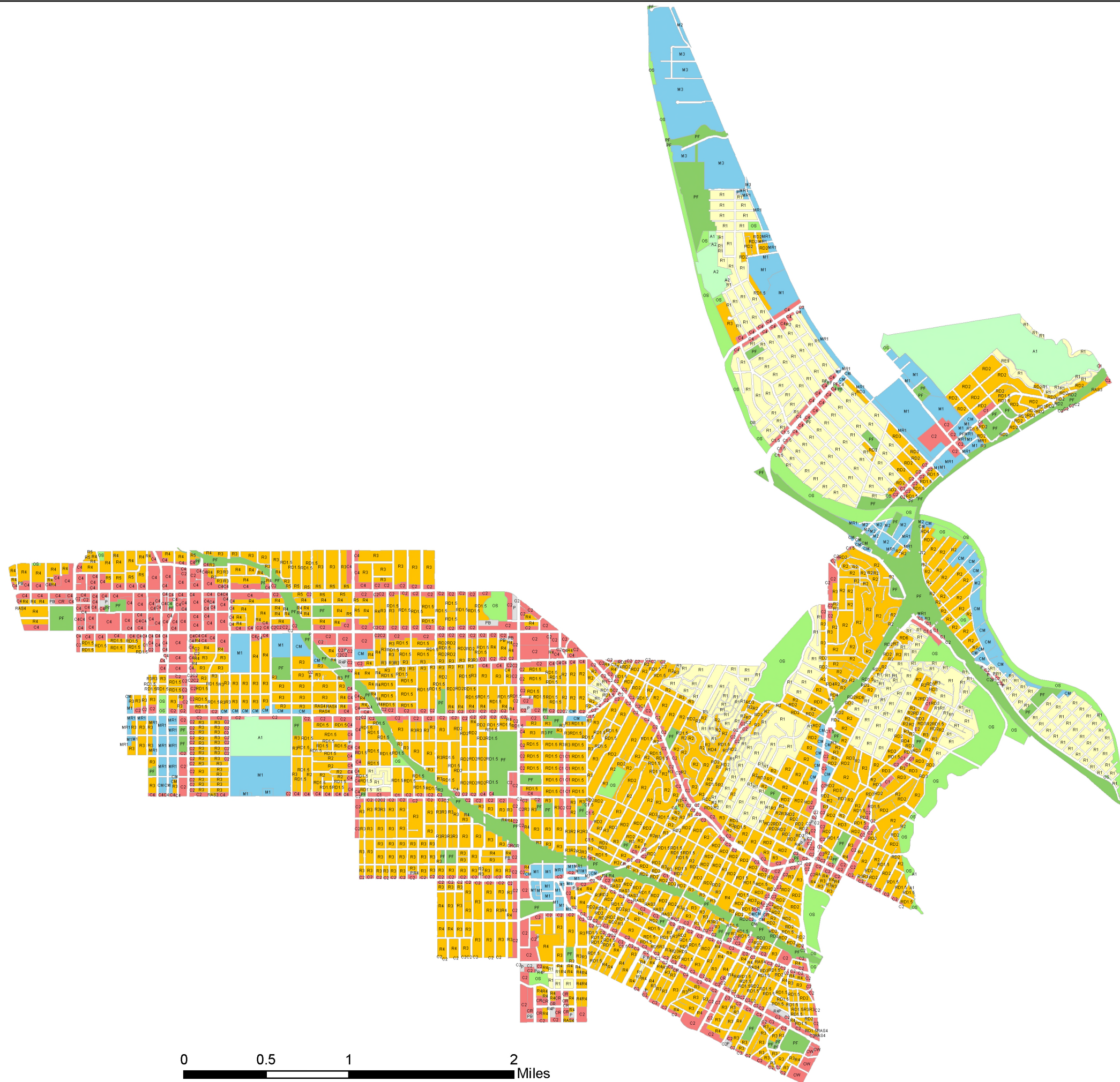
Council District 12 Zoning



- Agricultural
- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential
- Suburban



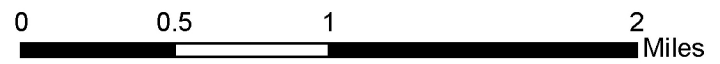
Council District 13 Zoning



- Agricultural
- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential

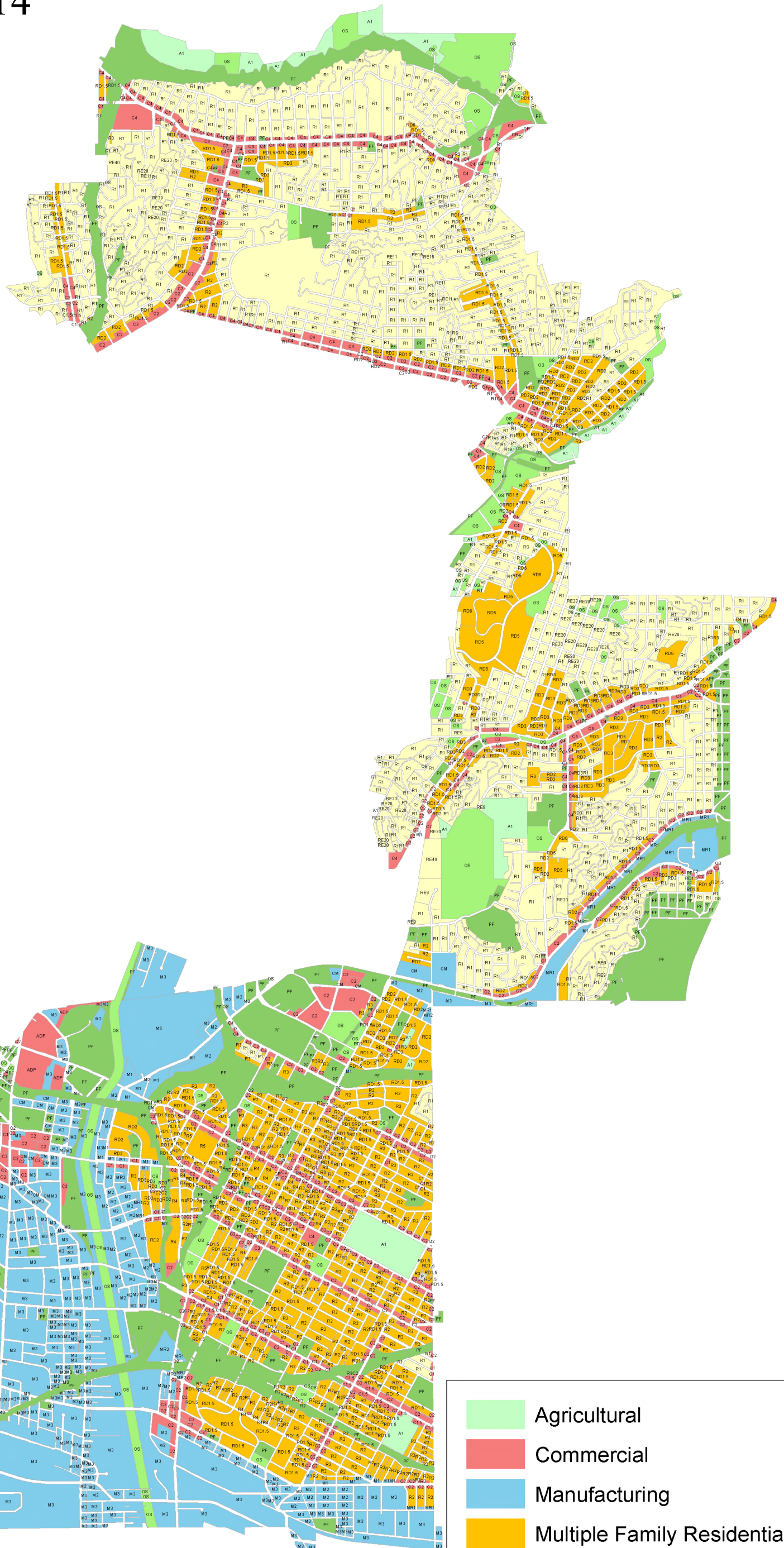


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Council District 14 Zoning



- Agricultural
- Commercial
- Manufacturing
- Multiple Family Residential
- Open Space
- Parking
- Public Facilities
- Single Family Residential



10/18/2016

